Remarks

Claims 1-7 and 9-10 are pending in this application. Claims 1-5 and 9 stand rejected under 35 U.S.C. 102(b) as being anticipated by Trader et al. (U.S. Patent No. 5,832,432). Claims 6 and 7 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Trader et al. in view of Holm et al. (U.S. Patent No. 5,850,629). Claim 10 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Trader et al. in view of Pearson et al. (U.S. Patent No. 6,114,939). The invention is believed to be patentable.

Claim 1 has been amended to clarify the actions of converting the sequence of text and pseudo words into a sequence of speech items and converting the sequence of speech items into a sequence of voice recordings. These amendments attempt to clarify the several layers of abstraction including the expansion of the text data, the conversion to the sequence of speech items, and then the conversion to the sequence of voice recordings, followed by the concatenating of adjacent recordings involved in the method of claim 1.

As amended, claim 1 recites a method for converting text to concatenated voice by utilizing a digital voice library and a set of playback rules. The digital voice library includes a plurality of speech items and a corresponding plurality of voice recordings. Each speech item corresponds to at least one available voice recording. The method comprises receiving text data, and expanding the text data to form a sequence of text and pseudo words. The method further comprises converting the sequence of text and pseudo words into a sequence of speech items in accordance with the digital voice library. At least one speech item in the sequence of speech items corresponds to multiple voice recordings. The method further comprises converting the sequence of speech items into a sequence of voice recordings in accordance with the set of playback rules. Selecting a voice recording for a speech item is based on context around the speech item in the text data when multiple voice recordings are available. The voice data is generated based on the sequence of voice recordings by concatenating adjacent recordings in the sequence of voice recordings.

As further recited in claim 1, the plurality of speech items includes a plurality of phrases. Converting the sequence of text and pseudo words further includes parsing the sequence of text and pseudo words to determine any phrases.

Support for these amendments may be found, for example, in the specification at page 10, lines 12-29 which describe certain aspects of the digital voice library.

Applicants maintain that Trader fails to anticipate the claimed invention. Trader describes a method for converting a text classified ad to a natural sounding audio ad. Ads from a print media ad database are downloaded to a host processor that identifies relevant ads and converts the abbreviated text of the print ad to an expanded version of the ad. The words and phrases of the expanded version are parsed and stored in appropriate fields of a relational database. A sequenced play list of audio file numbers corresponding to the words and phrases contained in a database record is created along with glue words and phrases that are added to produce a more natural sounding audio.

The claimed invention is far different than Trader which matches the ad words against an ad vocabulary. More specifically, Trader is simply matching words to audio files and generating a play list. According to the invention, text data is received, and processed in a sequence of specific actions with the final action being the generating of the voice data. In the claimed invention, the digital voice library and the set of playback rules critically affect the process between the text data and the voice data. As specifically recited in claim 1, when converting the sequence of speech items into the sequence of voice recordings, the voice recording where multiple voice recordings are available for a speech item is based on context around the speech item in the text data.

In the final action, the Examiner broadly interpreted Applicants' claims and stated that the claimed speech items are nothing more than labels or identifiers for the plurality of voice recordings in the playback database. Applicants disagree with the interpretation of the term "speech items" and have attempted to clarify claim 1.

In summary, Trader is only matching words to numbered audio files and then creating a play list according to rules that insert glue words. Trader has significant shortcomings, and Trader fails to anticipate the claimed invention. For example, Trader fails to suggest a combination including "selecting a voice recording where multiple voice recordings are available for a speech item is based on context around the speech item in the text data." Accordingly, independent claim 1 is believed to be patentable. The remaining claims are dependent claims and are also believed to be patentable.

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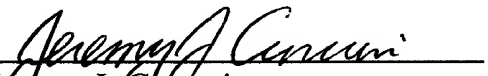
Respectfully submitted,

ELIOT M. CASE ET AL.

By 

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